TECHNICAL REVIEW DOCUMENT

for

OPERATING PERMIT 020PAD250

to be issued to:

W. J. Whatley, Inc.
Adams County
Source ID 0010531

April 4, 2003, Modified April 9, 2004, July 14, 2004, & July 29, 2004

I. PURPOSE

This document establishes the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered within the Operating Permit proposed for this site. It is designed for reference during review of the proposed permit by the EPA and during Public Comment. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Conclusions in this document are based on information provided in the original application submittal of November 26, 2002, and supplemental Title V technical information.

Any revisions made to the underlying construction permits associated with this facility in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. **This operating permit incorporates and amends the permittee's existing construction permits and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.**

II. SOURCE DESCRIPTION

This facility manufactures fiberglass light poles. The facility is located at 6980 East 54th Place, Commerce City, Colorado. There is no affected state within 50 miles of the facility. Rocky Mountain National Park is a Federal Class I designated area within 100 kilometers of the plant.

The facility wide emissions potential emissions are as follows:

	Potential
Pollutant	Tons Per Year
Volatile Organic Compounds (VOC)	80
Total HAPs	51.0
Individual HAPs:	
Toluene	1.0
MEK	10.0

Pollutant

Potential

Tons Per Year

Styrene 40.0

The area in which the plant operates is designated as attainment for all regulated pollutants. Based on the information provided by the applicant, the plant is not categorized as a major stationary source (no single criteria pollutant emissions with a Potential to Emit of greater than 250 tons per year) as of the issue date of this permit. The plant, therefore, is not subject to the Prevention of Significant Deterioration (PSD) review requirements of 40 CFR 52.21 (Colorado Regulation No. 3, Part B, Section IV.D.3).

Future modifications at the plant which are major by itself will result in the application of the PSD review requirements. In addition, future modifications at the plant may result in the facility being classified as a major stationary source. Once that threshold is exceeded, future modifications at the plant resulting in a significant net emissions increase (See Colorado Regulation No. 3, Part A, Section I.B.37 and 58) for any pollutant as listed in Colorado Regulation No. 3, Part A, Section I.B.58, or a modification which is major by itself may result in the application of the PSD review requirements.

There are no other Operating Permits associated with this plant for the purposes of determining the applicability of the PSD regulations.

III. EMISSION SOURCES

The facility manufactures fiberglass light poles. There is a process line for short poles and one for longer poles. The light poles are produced by passing fiberglass strands through a vat of polyester resin and winding the strands around a steel mandrel (mold). Steam from the boiler is pumped into the mold to cure (harden) the resin. The poles are then painted in an automated paint booth. Poles are placed into the decorative mold and resin added. Wax or cellophane is used as a mold release. Pole bases are created by either laying up resin-impregnated fiberglass inside external molds or casting polyurethane in closed molds. The bases are finished by spray application of paint. All emissions are fugitive emissions.

The following construction permits had been issued for the plant: 11AD154 (DeVilbis spray booth), 92AD1418 (Viking spray booth), 91AD411 (filament winding), and 96AD675 (casting and laminating). Whatley requested the construction permits be incorporated into a facility-wide construction permit. The issuance of a facility-wide construction permit was considered, but the APCD determined that a facility-wide construction permit was unnecessary since the operating permit will be issued as a combined construction permit-operating permit. A draft construction permit (01AD798) was actually developed. However, this permit was never issued.

Whatley uses high strength, high HAP resins frequently in the manufacturer of utility poles. They requested the polyester resin styrene content limit set by Construction Permit 91AD411 Condition 8 be increased from 37% to 43% in the facility-wide permit to allow for the use of the high HAP resin. Condition 8 of Construction Permit 91AD411 also required the polyester resin used contain vapor suppressants. The vapor suppressants inhibit the adhesion of the paint to the fiberglass unless the suppressants are removed with a solvent prior to painting. The use of solvents to remove the vapor

suppressants seemed counter-productive to reducing emissions. Whatley requested the requirement to use the vapor suppressants not be incorporated into the operating permit.

Since the equipment covered by the combined construction/operating permit has been operating for more than 180 days by the due date of the first semi-annual monitoring report required by this Operating Permit, the Division considers that the Responsible Official certification submitted with that semi-annual report will serve as the self-certification.

Applicable requirements are as follows.

- Limits volatile organic compounds and total hazardous air pollutants emissions on a rolling twelve month basis
- Limits opacity (Colorado Regulation No. 1, II.A.1 & 4). Note: The nature of the process does not result in opacity emissions, therefore this opacity limit is not included in the operating permit. The opacity limitation will be contained in the general permit conditions. However, this does not imply that W.J. Whatley will need to conduct any opacity monitoring.
- Requires records of consumption rate on a monthly basis and criteria and hazardous air pollutants emission rates.
- State-only Subject to odor control requirements of Colorado Regulation No. 2
- Good work practices for controlling fugitive volatile emissions

Emission Factors – VOC and HAP emissions are estimated using a mass balance of material consumption and Unified Emission Factors for Open Molding Composites, published by the Composite Fabricators.

Monitoring – Actual monthly material consumption is used to estimate the monthly and the rolling twelve month total emissions, for comparison to emission limits.

IV. MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (MACT)

Under the Federal Clean Air Act (the Act), EPA is charged with promulgating maximum achievable control technology (MACT) standards for major sources of hazardous air pollutants (HAPs) in various source categories by certain dates. Section 112(j) of the Act requires that permitting authorities develop a case-by-case MACT for any major sources of HAPs in source categories for which EPA failed to promulgate a MACT standard by May 15, 2002. These provisions are commonly referred to as the "MACT hammer".

Based on the information provided by this source, W. J. Whatley is a major stationary source of HAPs (i.e. facility-wide potential to emit of greater than 10 tons per year of any single HAP or greater than 25 tons per year of all HAPs combined) for a covered source category (Reinforced Plastics Composites Production) and did submit a Part 1 application to the Division prior to May 15, 2002.

The MACT for Reinforce Plastics Composite Production (40 CFR Part 63, Subpart WWWW) was originally proposed on 8/2/01. The Final rule was published in the Federal Register on 4/21/03. The compliance date for WWWW is 4/21/06. This Operating Permit was originally drafted without the MACT included, because the final rule had not been published in the Federal Register yet. However, the final rule was published before this permit went to public notice. The specific MACT requirements have now been determined and added to the permit.

V. ACCIDENTAL RELEASE –112(r)

Section 112(r) of the Clean Air Act mandates a new federal focus on the prevention of chemical accidents. Sources subject to these provisions must develop and implement risk management programs that include hazard assessment, a prevention program, and an emergency response program. They must prepare and implement a Risk Management Plan (RMP) as specified in the Rule.

Based on the information provided by the applicant, this facility is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act).

VI. COMPLIANCE ASSURANCE MONITORING (CAM)

The following emission points at this facility use a control device to achieve compliance with an emission limitation or standard to which they are subject and have pre-control emissions that exceed or are equivalent to the major source threshold. They are therefore subject to the provisions of the CAM program as set forth in 40 CFR Part 64 as adopted by reference into Colorado Regulation No. 3, Part C, Section XIV: None

VII. EMISSION FACTORS

From time to time published emission factors are changed based on new or improved data. A logical concern is what happens if the use of the new emission factor in a calculation results in a source being out of compliance with a permit limit. For this operating permit, the emission factors or emission factor equations included in the permit are considered to be fixed until changed by the permit. Obviously, factors dependent on the fuel sulfur content or heat content can not be fixed and will vary with the test results. The formula for determining the emission factors is, however, fixed. It is the responsibility of the permittee to be aware of changes in the factors, and to notify the Division in writing of impacts on the permit requirements when there is a change in factors. Upon notification, the Division will work with the permittee to address the situation.

VIII. Permit Shield

The intent of the permit shield is to provide limited protection to the facility in the event of an error in the evaluation of whether a regulation, or portion of a regulation applies. The facility identifies the issue and presents its position. The Division reviews the position. If the Division and the facility mutually agree on the position, the issue is recorded in the permit. If, at a later date, it is determined that an error was made in the mutual decision, the facility is protected from enforcement action until the permit can be reopened and the correct requirements and a compliance schedule inserted.

No specific regulations were cited by W. J. Whatley, Inc. as non-applicable to this source.